



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

March 17, 2016

Mr. Robert Sjogren, CI & EHS Manager
Mott Corporation
84 Spring Lane
Farmington, CT 06062

RE: NOTICE OF VIOLATION of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and Regulations of Connecticut State Agencies (RCSA): 22a-449(c)-100 through 119.

Dear Mr. Sjogren:

On March 1, 2016, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Mott Corporation, EPA ID No. CTR000510966, with RCSA 22a-449(c)-100 through 119 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Connecticut has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of RCSA 22a-449(c)-100 through 119 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

1. Failure to mark the date upon which each period of accumulation begins
At the time of the inspection, a 55-gallon container of mixed solvent waste was stored in a flammable cabinet located in the Polishing area. The container was not at or near the point of generation and its label had no date upon which the period of accumulation began.
2. Failure to provide a containment system, for the container storage area, with sufficient capacity to contain 10 % of the volume of containers or the volume of the largest container, whichever is greater.
At the time of the inspection, a 55-gallon container of mixed solvent waste was stored in a flammable cabinet located in the Polishing area. There was insufficient capacity to contain 10 % of the volume of the containers or the volume of the largest container, whichever is greater.

3. Failure to label or mark clearly each container and tank with the words "Hazardous Waste" and other words that identify the contents of each container or tank such as "flammable", "acid", "alkaline", "cyanide", "reactive", "explosive", "halogenated solvent" or the chemical name.

At the time of the inspection, a 55-gallon container of mixed solvent waste was stored in a flammable cabinet located in the Polishing area. There were no words "Hazardous Waste" and other words that identify the contents of the container.

4. Failure to provide adequate personnel training, and, to provide required records to document the training.

At the time of the inspection, there were no records to document all of the required training of personnel.

5. Failure to conspicuously place "No Smoking" signs wherever there is a hazard from ignitable or reactive waste.

At the time of the inspection, there were no "No Smoking" signs in the hazardous waste storage area.

6. Failure to inspect all storage areas, at least weekly, where containers are stored, and, to record inspections in an inspection log or summary.

At the time of the inspection, a 55-gallon container of mixed solvent waste was stored in a flammable cabinet located in the Polishing area. There were no records of inspections of mixed solvent waste containers.

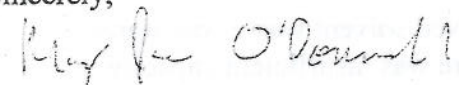
Mott Corporation must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.

Within (30) thirty calendar days of receipt of this NOTICE, submit a written description, with supporting documentation, of the actions taken to address requirements 1 through 9 above. Submit the information to:

Donald MacLeod, Environmental Engineer
U.S. Environmental Protection Agency
Office of Environmental Stewardship (OES05-4)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Donald MacLeod, of my staff, at 617-918-1405.

Sincerely,


Mary Jane O'Donnell, Manager

RCRA, EPCRA & Federal Programs Unit

cc: Kevin Barret (Western), CTDEEP
File

